

MBO, LLC PER 20080001 MAIN FILE

October 7, 2009

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pmr DeHart

Mr. Eura DeHart
Water Permits Division
Louisiana Department of Environmental Quality
P.O. Box 4314
Baton Rouge, Louisiana 70821-4313

**RE: INDUSTRIAL WASTEWATER DISCHARGE PERMIT APPLICATION
MBO, LLC D/B/A LACASSINE OILFIELD SERVICES
19141 GRO RACCA ROAD, IOWA, LA 70647
JEFFERSON DAVIS PARISH, LOUISIANA – AI NUMBER 152245
REVISION OF ENVIRONMENTAL IMPACT QUESTIONNAIRE**

Dear Mr. DeHart:

MBO, LLC (MBO) submits the attached revisions to the questions contained on Page 23 of 25, Section VII – “Environmental Impact Questionnaire” of MBO’s application to the Louisiana Department of Environmental Quality (LaDEQ) for an Industrial Wastewater Discharge Permit.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that the qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

If you have any questions or comments please contact me at 832-229-5605.

Sincerely,



David Turkal
President

cc: Mark Roth – Golder Associates Inc.
Phil Thibodeaux – MBO, LLC

DEQ – OES
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SECTION VII - ENVIRONMENTAL IMPACT QUESTIONNAIRE

Those applicants that are (1) major new facilities or (2) existing major facilities applying for a substantial modification to their permit must complete this questionnaire.

There is no requirement that the information furnished in response to this questionnaire be certified by a professional engineer or other expert. However, simple "yes" or "no" answers will not be acceptable. A measured response should be given for each question posed, taking into consideration appropriate factors such as: the environmental sensitivity of the area, both for the proposed site and alternative sites; impacts on the economy of the area, both favorable and unfavorable; availability of raw materials, fuels and transportation and the impact of potential sites on their availability and economics; relationship of the facility to other facilities, either within or independent of the company, and the effects of location on these relationships; and other factors which may be appropriate on a case-by-case basis. **(Attach any additional pages if needed.)**

1. Have the potential and real adverse environmental effects of the proposed facility been avoided to the maximum extent possible?

Please refer to the attached page(s) with the answer to Question No. 1.

2. Does a cost benefit analysis of the environmental-impact costs balanced against the social and economic benefits of the proposed facility demonstrate that the latter outweighs the former?

Please refer to the attached page(s) with the answer to Question No. 2.

3. Are there alternative projects which would offer more protection to the environment than the proposed facility without unduly curtailing nonenvironmental benefits?

Please refer to the attached page(s) with the answer to Question No. 3.

4. Are there alternative sites which would offer more protection to the environment than the proposed facility site without unduly curtailing nonenvironmental benefits?

Please refer to the attached page(s) with the answer to Question No. 4.

5. Are there mitigating measures which would offer more protection to the environment than the facility as proposed without unduly curtailing nonenvironmental benefits?

Please refer to the attached page(s) with the answer to Question No. 5.

Question No. 1: "Have the potential and real adverse environmental effects of the proposed facility been avoided to the maximum extent possible?"

Response: Yes, the potential and real adverse effects of the facility have been avoided to the maximum extent possible. The LOS facility accepts for treatment, Exploration and Production (E&P) waste. All E&P waste as defined in 43LAC § 501 will be accepted at the facility except Waste Types 12, 50 and 06 with a benzene concentration of greater than 113 ppm.

All waste treated or disposed of at the facility will be generated off-site except for water that comes in contact with the waste in the treatment cells

The facility will treat and dispose of both aqueous and solid E&P wastes. Additionally, storm water that has come in contact with the solid E&P waste in the treatment cells (process water) will be disposed of in the on-site saltwater disposal wells.

The facility maintains a SPCC plan and a SWP3 as part of the requirements of the "General Permit Number LAR100000 (Storm Water General Permit for Construction Activities – Five Acres or More)". Storm water that comes in contact with operational areas at the facility (saltwater tanks, oil tanks, active treatment cells) is segregated from non-operational areas of the site by internal levees.

Question No. 2: "Does a cost benefit analysis of the environmental-impact costs balanced against the social and economic benefits of the proposed facility demonstrate that the latter outweighs the former?"

Response: The social and economic benefits of the facility outweigh the environmental-impact costs for the facility. The facility will benefit the E&P industry by providing a cost effective means of disposal of the wastes produced during their operations. By providing a disposal facility at a location within easy access to the points of generation, the facility will promote the overall welfare of the industry and residents of Louisiana. Furthermore, by minimizing the potential for pollution migration from the facility, the negative impacts of the disposal of E&P wastes throughout southwestern Louisiana will be lessened. In addition, the potential illegal dumping of E&P wastes will be minimized by having a cost effective solution.

The local economy of the Lacassine and Welsh area is bolstered by the facility by providing jobs to local residents and by increasing the tax revenue of Jefferson Davis Parish.

Question No. 3: "Are there alternative projects which would offer more protection to the environment than the proposed facility without unduly curtailing non-environmental benefits?"

Response: There are no alternative projects which would offer more protection to the environment than the facility without unduly curtailing non-environmental benefits. The site is located in a sparsely populated area, used primarily for agricultural purposes. Since there are significant amounts of E&P wastes generated in southwestern Louisiana, it is beneficial to the environment to provide for the treatment and disposal of this waste near the point of generation.

The treatment of E&P wastes by removal of chlorides and by employing bioremediation of solid E&P waste is a proven technology for the minimization of environmental hazards of E&P wastes. The alternatives currently available to this treatment process are disposal of the waste at a hazardous waste facility and other costly facilities.

Question No. 4: "Are there alternative sites which would offer more protection to the environment than the proposed facility site without unduly curtailing non-environmental benefits?"

Response: There are no alternative sites that would offer more protection to the environment than the facility site. The site was chosen because it is located in a sparsely populated area, with easy access to the points of generation and access to state roads. The site is not located within 1,000 feet of an active private water well or within 1 mile of a public water well. The treatment

cells are located more than 1,500 feet from the nearest residence, public building, hospital, church, school, daycare centers, or other public building. There are no known wetlands located on the property, and there is more than 36 inches separating the land treatment cells from the groundwater in the upper water bearing zone at the site. The facility is not located in an ozone area, or non-attainment area, as defined by the Clean Air Act. Additionally, the site is located in an area designated to be outside of the 500-year flood plain.

The site was formally used (prior to 1994) for agricultural purposes, and between 1994 and 1999 was operated as a land treatment facility. There are no known sites of cultural interest, or historical significance near the facility.

Question No. 5: "Are there mitigating measures which would offer more protection to the environment than the facility as proposed without unduly curtailing non-environmental benefits?"

Response: The facility is designed to offer the maximum protection to the environment for the disposal of E&P wastes. There are no economically feasible alternatives for the disposal of this waste that offers more protection to the health and the environment of Louisiana.

The facility is an integral part of the waste management system for the State of Louisiana.